

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA,)
)
v.)
)
HEATHER IDONI)

Case No. 3:22-cr-00327
Judge Trauger
Magistrate Judge Holmes

**DEFENDANT IDONI’S MOTION TO MODIFY CERTAIN CONDITIONS OF
PRETRIAL RELEASE**

Defendant Heather Idoni, by and through undersigned counsel, and pursuant to 18 U.S.C. § 3142(c)(3), moves this Court to modify one condition of her pretrial release order that was entered by the Eastern District of Michigan (*see* D.E. 32-5) and adopted by this Court (*see* D.E. 114). Ms. Idoni requests the following: (1) modify condition 7(h) to allow her to visit with and speak to other co-defendants in the case, including but not limited to Eva Edl. In support of this request, Ms. Idoni would state the following:

Ms. Idoni is indicted on one count of conspiracy to obstruct access to a clinic providing reproductive health services under 18 U.S.C. § 241 and a single misdemeanor count of violating 18 U.S.C. § 248(a)(1), also known as the Freedom to Access to Clinic Entrances (the “FACE” Act). The violation occurred on March 5, 2021 at the Carafem Health Center located in Mt. Juliet, Tennessee. (D.E. 3, ¶ 14-27).

The Court has broad discretion as to both the conditions of pretrial release and modifications. As to the release modification allowing Ms. Idoni to visit with and talk to other co-defendants in the case, Defendant Calvin Zastrow and Defendant Eva Edl have been granted similar requests. (*See* D.E. 88 and D.E. 105, respectively). Ms. Idoni simply wants to be able to speak with her close friends, many of whom happen to be co-defendants in this case, without fear

of violating a condition of release. She would not speak with any of the other co-defendants about the facts or circumstances of the indictment.

Undersigned counsel has consulted with the United States Attorney about this motion. She does not object to allowing Ms. Idoni to speak with other co-defendants in this case as long as they do not discuss the facts and circumstances surrounding the indictment.

CONCLUSION

For the foregoing reasons, Defendant Heather Idoni requests this Court modify her conditions of release to speak with her co-defendants.

/s/ William J. Conway
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing motion has been delivered by the Court's CM/ECF system to **AUSA Amanda Klopff**, 110 9th Ave. South, Ste. A-961, Nashville, TN 37203, and the other counsel of record on this **30th day of May 2023**.

/s/ William J. Conway
WILLIAM J. CONWAY